

**REMARKS**

Claims 1, 2 and 5-16 are all the claims pending in the application.

Applicant thanks the Examiner for indicating that claims 2 and 12 would be allowable if rewritten in independent form. These claims have been rewritten in independent form, including all of the limitations of the base claim; therefore, they should be allowable. In addition, claims 14-16 should be allowable based on their dependence from claim 12.

Claims 1 and 10 have been amended to further clarify the claimed invention and to address the objection to claim 10 and 35 U.S.C. § 112 rejection of claim 10.

**PRIOR ART REJECTIONS**

The Examiner has rejected claims 1, 8, 10, 15 and 16 under 35 U.S.C. § 103(a) as being unpatentable over Lee (U.S. App. No. 2005/0040508) in view of Go (U.S. App. No. 2005/0012195). Applicants first note that claims 15 and 16 should be allowable based on their dependence from claim 12, for the reasons discussed above. Applicants traverse the rejections of claims 1, 8 and 10 because the cited references fail to disclose or suggest all of the claim limitations and because one of skill in the art would not be motivated to combine the references.

In response to Applicants' arguments in the Amendment dated May 18, 2009, which Applicants incorporate by reference herein, the Examiner argues that there "is no structural language in claim 1 or 10 which states that the encapsulation is used for support, only that it fills the opening and covers the substrate face and plurality of wires."

Applicants have amended claims 1 and 10 to specifically include structural limitations related to the encapsulation/encapsulant enabling mounting that are missing from the cited prior art. Therefore, for the reasons contained in the May 18, 2009 Amendment, these claims and claim 8 should be allowable over Lee and/or Go.

In addition, the Examiner states that Go et al. is relied upon solely for encapsulation purposes only and not for structural or stacking purpose. In light that the feature of the encapsulant enables mounting of the secondary IC structure on the first IC structure, which is not suggested nor addressed by Go et al., a person skilled in the art and with knowledge of Lee would not be motivated to encapsulate the secondary opening around the second plurality of wires and the second secondary substrate face such that it enables mounting of the secondary IC structure on the base IC structure.

Regarding the rejection of claims 5-7, 11 and 13, the should be allowable at least based on their dependence from claims 1 or 10.

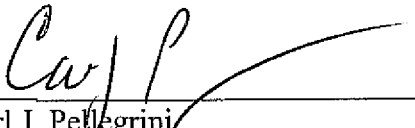
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.116  
U.S. Appln. No.: 10/552,046

Attorney Docket No.: Q74738

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

  
\_\_\_\_\_  
Carl J. Pellegrini  
Registration No. 40,766

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: December 10, 2009